**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON DATA
SERVICES, INC.,

      Plaintiffs,

      v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS, et al.,

      Defendant.

---

800 HOYT LLC,

      Intervening Interpleader Plaintiff /
      Intervening Interpleader Counter-
      Defendant,

v.

BRIAN WATSON, WDC HOLDINGS, LLC,
and BW HOLDINGS, LLC,

      Interpleader Defendants

AMAZON.COM, INC. and AMAZON DATA
SERVICES, INC.

      Interpleader Defendants / Interpleader
      Counter-Plaintiffs.

CASE NO. 1:20-CV-484-RDA-TCB

**WATSON DEFENDANTS' MOTION FOR
COURT-HOSTED SETTLEMENT CONFERENCE OR PRIVATE MEDIATION**

Pursuant to Local Civil Rule 83.6(A) and Paragraph 8 of the Rule 16(B) Scheduling Order

(Dkt. 455), Defendants WDC Holdings LLC, Brian Watson, Sterling NCP FF, LLC, Manassas

NCP FF, LLC, and NSIPI Administrative Manager (collectively, the "Watson Defendants"),

respectfully seek an order from the Court compelling a court-hosted settlement conference or

1

private mediation. Pursuant to Local Civil Rule 7(E), the Watson Defendants conferred in good

faith with Plaintiffs regarding the relief sought in this motion, but were not able to reach agreement.

Specifically, the Watson Defendants believe that a court-hosted settlement conference or

private mediation would be beneficial to all of the parties and is consistent with principles of justice

and fairness. In further support of this Motion, the Watson Defendants rely upon their

Memorandum in Support of Motion for Court-Hosted Settlement Conference or Private Mediation,

which is submitted herewith in accordance with Local Civil Rule 7(F).

*   *   *   *   *

Dated: June 27, 2022

Respectfully submitted,

/s/ Stanley L. Garnett
Stanley L. Garnett (*pro hac vice*)
Amanda K. Houseal (*pro hac vice*)
Sara R. Bodner (*pro hac vice*)
Brownstein Hyatt Farber Schreck, LLP
410 17th Street, Suite 2200
Denver, CO 80202
Telephone: (303) 223-1100
Facsimile: (303) 223-1111
sgarnett@bhfs.com
ahouseal@bhfs.com
sbodner@bhfs.com

/s/ Jeffrey R. Hamlin
Jeffrey R. Hamlin (VA Bar No. 46932)
George R. Calhoun (*pro hac vice*)
James Trusty (*pro hac vice*)
IFRAH PLLC
1717 Pennsylvania Avenue NW, Suite 650
Washington, DC 20006
Telephone: (202) 524-4140
Facsimile: (202) 524-4141
jhamlin@ifrahlaw.com
george@ifrahlaw.com
jtrusty@ifrahlaw.com

Counsel for WDC Holdings LLC, Brian
Watson, Sterling NCP FF, LLC, Manassas
NCP FF, LLC, NSIPI Administrative Manager,
and BW Holdings LLC

3

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2022, I will electronically file the foregoing using the Court's CM/ECF system, which will provide service to all counsel of record, and will separately email *pro se* parties, as follows:

Elizabeth P. Papez
Patrick F. Stokes
Claudia M. Barrett
Michael R. Dziuban
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W. Washington, D.C. 20036-5306
epapez@gibsondunn.com
pstokes@gibsondunn.com
cbarrett@gibsondunn.com
mdziuban@gibsondunn.com

Veronica S. Moye
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue, Suite 2100
Dallas, TX 75201
vmoye@gibsondunn.com
Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

Aaron G. McCollough
McGuireWoods LLP
77 West Wacker Drive, Suite 4100
Chicago, IL 60601
amccollough@mcguirewoods.com
Counsel for Receiver

Casey Kirschner*
635 N. Alvarado Lane
Plymouth, MN 55447
casey.kirschner@gmail.com

Alex Little
Rachel Friedman
Burr & Forman LLP
222 Second Ave. South, Suite 2000 Nashville, TN 37201
Alex.little@burr.com
rfriedman@burr.com
Counsel for Carleton Nelson and Cheshire Ventures

Lindsay R. McKasson
Jared J. Roberts
Binnall Law Group, PLLC
717 King Street, Suite 200
Alexandria, Virginia 22314
lindsay@binnall.com
jared@binnall.com
Counsel for Renrets, LLC

Julie S. Palmer
M. Scott Fisher, Jr.
Angela R. MacFarlane
Harman, Claytor, Corrigan & Wellman, PC
P.O. Box 70280
Richmond, VA 23255
jpalmer@hccw.com
sfisher@hccw.com
amacfarlane@hccw.co
Counsel for Rodney Atherton

/s/ Jeffrey R. Hamlin
Jeffrey R. Hamlin

* I further certify that I will send the aforementioned materials via First-Class Mail to Mr. Kirschner at the address shown.